

A photograph of a woman with dark hair, wearing a bright yellow sleeveless top and a tan skirt with gold buttons, smiling broadly and shaking hands with another person whose back is to the camera. The person in the background is wearing a light blue sweater. The background is softly blurred with warm, bokeh-style lights.

kovecta

Code of ethics for suppliers

Corporate policies 2025

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Purpose

The Code of Ethics for Suppliers (hereinafter, the “Code”) is understood as an extension of the Code of Ethics of Konecta, a multinational group of companies specialising in the provision of digital customer management services and solutions (hereinafter, Konecta, the Company, or the Firm), and its regulatory framework as part of its Compliance Program. Its purpose is to establish the minimum guidelines that suppliers must maintain for the proper performance of their activities, in line with the company’s corporate culture and values, expressing its commitment to respect for human rights, integrity and ethical behaviour, protection of the environment and safety, as well as the protection and transparency of information.

This Code also seeks to respond to the expectations of the company’s stakeholders (employees, customers, partners and shareholders, investors, financial institutions, suppliers, public administration, and regulatory bodies), ensuring scrupulous compliance with the laws and regulations in force in each country, its own requirements, and international standards. This Code will be available on the corporate website (www.konecta.com) to ensure that it can be consulted by all interested parties.

Konecta considers suppliers to be strategic partners who are essential to achieving its goals of excellence and customer satisfaction. It therefore seeks to build strong alliances based on mutual trust and shared success.

Thus, this Code sets out the expectations of conduct that govern this relationship, extending to the supplier’s entire supply chain. It is essential that this document be known and accepted before formalising any contractual relationship and that its principles remain in force throughout the commercial collaboration. In this regard, Konecta’s suppliers are expected to act with the necessary diligence to prevent any action that could damage the company’s reputation or its environment.



02

Scope of application

This Code must be observed by all Konecta suppliers or subcontractors in all countries in which it operates, and its application is global. Likewise, they shall encourage their contractors, collaborators, persons acting on their behalf, and all those involved in their supply chain to maintain the same ethical behaviour and compliance with current legislation.

Suppliers are obliged to be familiar and comply with this Code, adhering to it and expressing their commitment to comply with the ethical principles contained therein and their willingness to promote them in their own supply chain, in accordance with the procedures defined by Konecta in procedures PG COR 08 Supplier Approval and PG COR 05 Purchasing.

Konecta requires its suppliers to strictly comply with the current legislation of the countries in which it operates, as well as to behave ethically, honestly, and with integrity in their business relationships, both with the company and with third parties. These third parties include public officials, customers, suppliers, and members of the community.

Given that many of Konecta's companies have their registered office outside the European Union, internal regulations will be adapted to the regulations of each State, respecting and ensuring compliance with the basic principles set out herein.



03

Ethical principles for suppliers

As a signatory to the United Nations Global Compact, which the company joined in 2004, Konecta is committed to complying with its Guiding Principles and to promoting the Sustainable Development Goals within the framework of the 2030 Agenda, related to its business activity, in line with fundamental principles such as those of the Universal Declaration of Human Rights, and those established by the International Labour Organisation (in particular those relating to the prohibition of child and forced labour), and by the OCDE (in particular in the fight against corruption).

The company selects its suppliers based on their commitment to, respect for, and compliance with these principles, as well as with the laws and regulations in force that are applicable in each of the countries in which it operates.

Koneccta sets out below a series of ethical principles for suppliers or subcontractors, which they must adhere to.

Working conditions

Suppliers shall treat their employees with respect and dignity, and provide equal opportunities in access to work and professional promotion, ensuring at all times the absence of discrimination on the basis of, among other things, racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national ancestry or social origin, or other forms of discrimination covered by EU regulations and local legislation in the countries where the company operates.

Suppliers shall provide their employees with a safe and healthy workplace, taking the necessary measures to prevent accidents and damage to the health of their workers, minimising, as far as possible, the risks inherent in the work.

Suppliers shall remunerate their workers in accordance with applicable wage laws, guarantee their employees' right to rest, adjusting the length of the working day to the provisions of applicable legislation or to the provisions of the collective agreement for the sector in question, and comply with the applicable labour legislation in force regarding working hours.

Suppliers shall facilitate and respect their employees' legally recognised rights to unionise, associate, and bargain collectively, subject to the applicable rules in each case and without reprisals for exercising those rights.

To guarantee respect for human and labour rights, Konecta requires its suppliers to commit to not allowing any form of forced, involuntary, or modern slavery labour. This means that workers cannot be asked to pay deposits or have their personal documentation withheld. Suppliers must also extend these principles to their own supply chain.

Furthermore, the use of child labour is strictly prohibited at any stage of their activities. Suppliers are required to comply with the minimum hiring ages established by law and international conventions, and to have reliable mechanisms in place to verify the age of their employees.

For further information, please refer to the Occupational Health and Safety Policy.

Quality

Konecta has a quality management system based on the ISO 9001 Standard and, in line with this, requires its suppliers to:

- Ensure that services and products meet Konecta's requirements and expectations.
- Provide quality control for all services and products to ensure compliance with the requirements agreed with Konecta.
- Ensure compliance with applicable legislation and regulations, as well as any other voluntarily acquired commitments.
- Maintain permanent contact with Konecta with the aim of collaborating jointly in the improvement of the services provided.

These commitments will be specified in specific objectives and goals, within a process of continuous improvement in accordance with their resources and impacts.

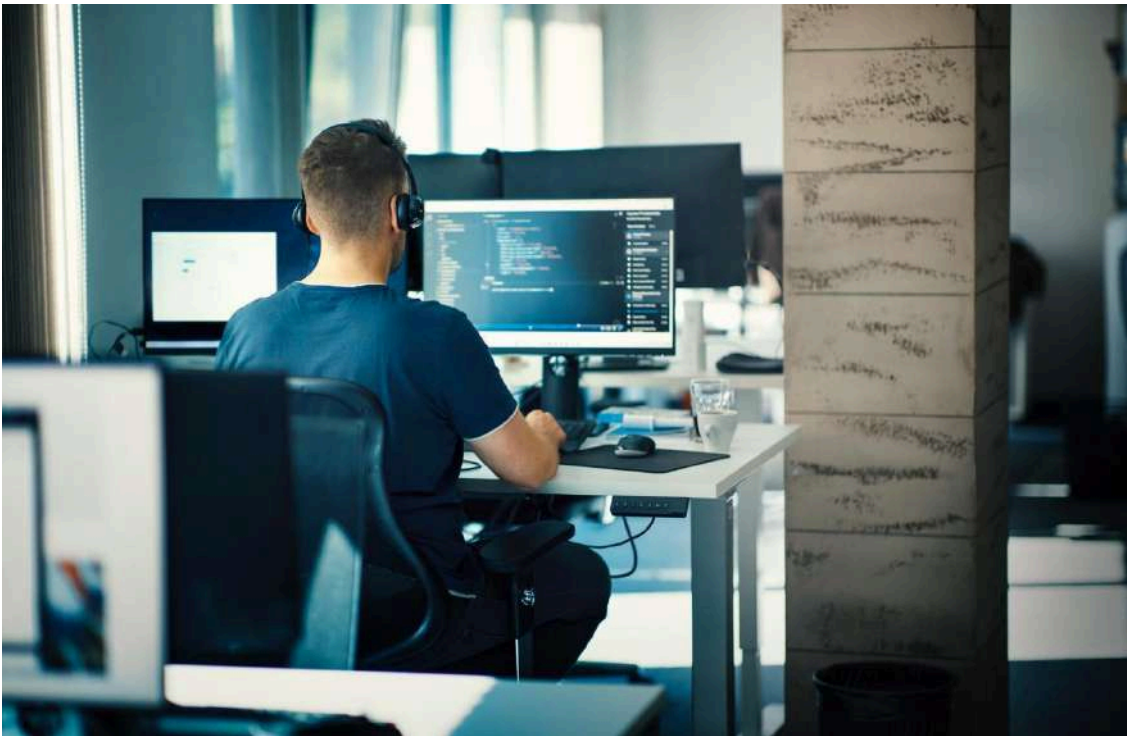
Professional ethics

- Suppliers must conduct their business activities with integrity, objectivity, transparency, and honesty, without engaging in corrupt activities or any other illegal or unethical practices.
- Suppliers shall not accept, offer, or grant commissions, gifts, or remuneration to public officials, Konecta employees, or any natural or legal person in the service of any authority, public or private entity, political party, or candidate for public office for the purpose of unlawfully obtaining or maintaining business or other advantages.
- Suppliers must maintain mechanisms that, in the event of a potential conflict of interest involving any of their employees, ensure that the independence of the supplier's actions and their full compliance with applicable legislation are not affected.
- Suppliers must preserve and protect the confidentiality of the information they receive as a result of their commercial activity with Konecta and shall comply without exception with current legislation on data protection and intellectual property. The obligation of confidentiality shall remain in force after the end of their relationship with Konecta and shall include the obligation to return any material related to the company that the supplier has in its possession.
- Preserving, respecting, and protecting the environment are priorities for Konecta. Therefore, our suppliers and subcontractors must act actively and responsibly to conserve the natural environment, complying with the standards and requirements established in applicable local and international legislation, and striving to reduce the environmental impact of their activities as much as possible.

They also undertake to comply with the environmental standards established by Konecra, including, where applicable, the measures to reduce and offset such impact that are necessary to apply these standards.

For further information, please refer to the Code of Ethics and the policies on Information Systems Security and Cybersecurity; Privacy and Confidentiality; and the Environment.

These principles of action respond to the impacts, risks and opportunities (IROs) arising from the applicable material issues: working conditions and equal treatment and opportunities in the value chain, climate change adaptation and mitigation, information security, compliance and corporate ethics, and supplier management.



04

Compliance with the code of acceptance and adherence

This Code is binding on all Konecta suppliers and subcontractors. In the event of a breach of the Code being detected, the supplier or subcontractor must, after notifying Konecta in writing through the channel provided for this purpose, remedy the breach as soon as possible. If such breach is not remedied within thirty (30) calendar days after such notification, the supplier shall be deemed to have breached its obligations and Konecta shall have the right to terminate any contract it may have with the supplier.

Konecta's suppliers undertake to inform Konecta if they become aware of any deviation from compliance with the Code of Ethics or the Code of Ethics for Suppliers. In this regard, a direct communication channel with the company, called Information Channels, has been made available to its various stakeholders on the corporate website via the URL: <https://konecta.integrityline.com>, to submit the appropriate communication in the event of detecting any type of non-compliance, in accordance with procedure PG COR 26 Information Channels, available in the same space, which specifies the different channels available and the nature of the communication that can be made through them.

This channel -the whistleblowing channel- has been created with high security standards in order to facilitate the reporting of any irregularities, ensure the confidentiality and protection of whistleblowers, and optimise the management of communications received.

The Information Channels are available 24 hours a day, 7 days a week. No retaliation will be tolerated against anyone who, in good faith, reports facts that could constitute a breach of this policy, and the guarantees and protections established by the applicable regulations and legislation will apply to the reporting parties.

The supplier must at all times be up to date with any modifications and updates to Konecta's Code of Ethics and the Code of Ethics for Suppliers.

Konecta will publish the Code and any modifications or updates to it on its website (www.konecta.com). The company will have the right to conduct audits in accordance with this section to verify the supplier's compliance with the Code.

Acceptance and adherence

It is an essential requirement that all suppliers participating in a negotiation process with Konecta and likely to be awarded products or services are approved in accordance with the processes defined by the company, ensuring compliance with current legislation on sustainability, due diligence, or other applicable legislation- and that the result of their approval is positive as established in corporate procedure PG COR 08 Supplier Approval.

Likewise, as part of this process, the supplier must expressly acknowledge in the corporate tool through which the company's purchases are made that they have read and understood the terms and conditions set out in this Code and confirm their acceptance, adherence, and commitment to comply with it.

For further information, please refer to the Responsible Purchasing Policy.

05

Updating and revision

The Code of Ethics for Suppliers will be reviewed and updated periodically, or when necessary, to adjust it to changes in the business model, or that may occur in Konecta’s field of activity, or as a result of the approval of directly applicable regulations, ensuring its effectiveness and compliance.

NOTE: This Code of Ethics for Suppliers has been reviewed and approved on December 16, 2025, by the highest governing body and replaces any previous version of it, with only this document being valid from this date onwards.

Version Control

Version	Review date	Reviewed	Validated	Approved	Reason for change
2	06/22/2021	Compliance Organization & Procedure	Legal Affairs	Board of Directors	General Code of Ethics for Suppliers Review
3	12/19/2022	Compliance Organization & Procedure	Legal Affairs	Board of Directors	General Code of Ethics for Suppliers Review
4	12/16/2025	Procurement Compliance Organization & Procedure	Legal Affairs	Board of Directors	Alignment with legal requirements Alignment with the new format and branding